

# **EXHIBIT D**

## Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Bachenberg Dimissal

4 messages

Thomas D. Siver <[tsiver@siverlaw.com](mailto:tsiver@siverlaw.com)>

Fri, Jun 13, 2025 at 2:27 PM

To: Todd Stuart <[tstuart@stuartlawplc.com](mailto:tstuart@stuartlawplc.com)>

Cc: Jonathon Burns [REDACTED] Michael Smith <[msmith@mikesmithlaw.com](mailto:msmith@mikesmithlaw.com)>

Good day!

Finally this order is the last order and closes the case. No part of this case is left open as bill is the last active defendant.

The language should be:

This order resolves the last pending claim and closes the case.

You agreed to my language in my order I had sent to you and I sent the funds. You requested the ability to change only the attorney names and addresses in the caption. It is my understanding you have defaulted the other parties therefore the case is over with bill resolving your claims against him.

Please make the changes and resubmit to me for approval. Or in the alternative sign my order.

Tom Siver  
Sent from my iPhone

On Jun 13, 2025, at 2:13 PM, Todd Stuart <[tstuart@stuartlawplc.com](mailto:tstuart@stuartlawplc.com)> wrote:

Updated draft

On Fri, Jun 13, 2025 at 1:55 PM Thomas D. Siver <[tsiver@siverlaw.com](mailto:tsiver@siverlaw.com)> wrote:

Good day!

First the 500k needs to reference it is being paid pursuant to the demand. My initial proposed order was sufficient and John agreed to it with only attorney names and addresses being changed.

Second this order is only for bill and he doesn't speak for attorney Lambert and doesn't need to make reference to her case.

Therefore please immediately make the changes and forward for approval. Finally, judge requires this order in word not pdf.

Tom Siver  
616-261-5800

Sent from my iPhone

On Jun 13, 2025, at 1:47 PM, Todd Stuart <[tstuart@stuartlawplc.com](mailto:tstuart@stuartlawplc.com)> wrote:

Tom, Mike and Jonathon,

Here is what we have for the cleaned up draft. Can I confirm everyone is in agreement and we will get this filed ASAP? Thanks!

Todd



**Todd A Stuart**  
Founder and Managing Member

Stuart Law, PLC

Appointments: [2851 Charlevoix Dr SE #207,](#)

[Grand Rapids, MI 49546](#)

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<2025-06-13\_c\_Apelbaum v Lambert - Stipulated Dismissal of Bachenburg.pdf>



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<2025-06-13 - Apelbaum v Lambert - Stipulated Dismissal of Bachenburg.docx>

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**Thomas D. Siver** <tsiver@siverlaw.com>  
To: Todd Stuart <tstuart@stuartlawplc.com>  
Cc: Jonathon Burns [REDACTED], Michael Smith <msmith@mikesmithlaw.com>

Fri, Jun 13, 2025 at 2:36 PM

Trying to reach out to you guys - someone please call me at 6162615800  
Sent from my iPhone

On Jun 13, 2025, at 2:14 PM, Todd Stuart <tstuart@stuartlawplc.com> wrote:

Sorry, corrected Mr. Bachenberg's name spelling. Thanks!

Todd  
[Quoted text hidden]

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**Thomas D. Siver** <tsiver@siverlaw.com>  
To: Todd Stuart <tstuart@stuartlawplc.com>  
Cc: Jonathon Burns [REDACTED] Michael Smith <msmith@mikesmithlaw.com>

Fri, Jun 13, 2025 at 4:29 PM

Good day!  
Struggling to have a conversation with my client.  
Is there a time we can have a call Monday.

Very truly tryouts,  
Tom Siver  
[Quoted text hidden]

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**Todd Stuart** <tstuart@stuartlawplc.com>  
To: "Thomas D. Siver" <tsiver@siverlaw.com>  
Cc: Jonathon Burns [REDACTED] Michael Smith <msmith@mikesmithlaw.com>

Fri, Jun 13, 2025 at 4:52 PM

I will make time. Let me know what works for everyone else. Have a great weekend everyone!  
[Quoted text hidden]

**Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Bachenberg Dismissal**

4 messages

**Thomas D. Siver** <[tsiver@siverlaw.com](mailto:tsiver@siverlaw.com)>

Mon, Jun 16, 2025 at 4:07 PM

To: Todd Stuart <[tstuart@stuartlawplc.com](mailto:tstuart@stuartlawplc.com)>

Cc: Jonathon Burns [REDACTED] Michael Smith <[msmith@mikesmithlaw.com](mailto:msmith@mikesmithlaw.com)>

Bill is traveling and I am hoping to be able to get some time with him tomorrow....thoughts on a time?  
Sent from my iPhone

On Jun 13, 2025, at 4:53 PM, Todd Stuart <[tstuart@stuartlawplc.com](mailto:tstuart@stuartlawplc.com)> wrote:

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